

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE
PLAYERS' CONCUSSION INJURY
LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

THIS DOCUMENT RELATES TO:

Hon. Anita B. Brody

Bush, et al. v. National Football League, et al.
No. 13-cv-04549

**RESPONSE OF THE NATIONAL FOOTBALL LEAGUE AND NFL PROPERTIES LLC
TO THE ORDER TO SHOW CAUSE (DOC. NO. 6894)**

Without prejudice and with full reservation of rights to oppose any future similar motions by Settlement Class Members, the National Football League ("NFL") and NFL Properties LLC (collectively, the "NFL Defendants") do not oppose the Motion to Include the Bush Plaintiffs in the "List of Pending Actions in MDL 2323 Involving Opt Out Plaintiffs." Although the Bush Plaintiffs submitted deficient opt-out requests that failed to provide all of the information required under Section 14.2 of the Settlement Agreement, the Bush Plaintiffs made timely submissions and the omitted phone numbers and/or date of birth (*see* 12-md-02323, Doc No. 6340-1 at Nos. 36, 198-201) do not bear on the determination of whether someone is an Opt Out.

Dated: September 6, 2016

Respectfully submitted,

/s/ Brad S. Karp

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Certificate of Service

On September 6, 2016, I electronically filed a copy of the foregoing document through the CM/ECF system for the United States District Court for the Eastern District of Pennsylvania, which will send a notice of electronic filing to all counsel of record and make it available for viewing and downloading from the CM/ECF system.

/s/ Brad S. Karp _____
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